



City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER

Government Center, 77 Park Street

Attleboro, Massachusetts 02703

Phone 774-203-1820 ♦ Fax 508-761-9837

Paul A. Kennedy
Superintendent
Department of Wastewater

November 7, 2012

Mr. Justin Pimpare
Regional Pretreatment Coordinator
EPA New England
5 Post Office Square
Suite 100 OEP 06-03
Boston, MA 02109

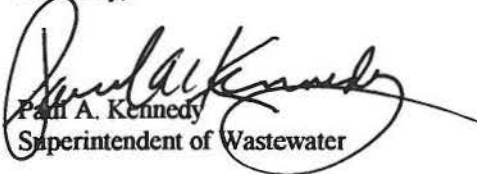
Subject: Metalor Technologies USA

Dear Mr. Pimpare:

Enclosed is a cover letter, along with a Compliance Order and the modified Industrial User Permit No. 026 issued to Metalor Technologies USA, which became effective November 6, 2012.

If you have any questions, please contact me.

Sincerely,



Paul A. Kennedy
Superintendent of Wastewater

Cc: Joseph Canzarno, EPA
David Turin, EPA
David Burns, DEP
Robert Greene, DEP
Kevin J. Dumas, Mayor City of Attleboro
Barry LaCasse, City of Attleboro
Aaron Dumont, City of Attleboro
John Reed, City of Attleboro
Thomas Hayes, City of Attleboro



City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER

Government Center, 77 Park Street

Attleboro, Massachusetts 02703

Phone 774-203-1821 ♦ Fax 508-761-9837

Paul A. Kennedy
Superintendent of Wastewater
Department of Wastewater

November 7, 2012

Metalor Technologies USA
52 Gardner Street
Attleboro, MA 02703

Subject: Industrial Permit No.026

Attention: Mr. Andrew Costa

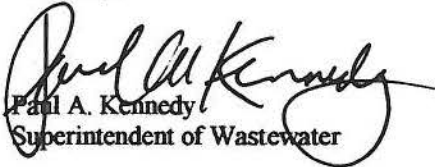
Enclosed is your company's modified Industrial User Discharge Permit No. 026. For some time now the Attleboro treatment plant has been dealing with very high concentrations of TKN (total kjeldahl nitrogen) from your facility. These concentrated discharges not only have increased our operating cost but most importantly do interfere with our nitrification/denitrification processes causing us to go out of compliance with our NPDES permit limit for total nitrogen.

Due to the fact that your company's concentrated discharge of TKN interferes with our treatment plant process causing us to go out of compliance the City must take the following actions to minimize this type of discharge to insure the continued compliance of the Attleboro Wastewater Treatment Plant.

The City of Attleboro's newly revised Local Limit for TKN is now 691 mg/l. In addition, your company's permitted Maximum Daily Discharge Flow Rate has been reduced from 60,000 gallons per day to 30,000 gallons per day. The enclosed limits for TKN and Maximum Daily Discharge Flow Rate are enforceable upon your receipt of this letter.

As in the past the City of Attleboro is willing to work with your company over the next several months with your endeavors to achieve compliance.

Sincerely,



Paul A. Kennedy
Superintendent of Wastewater

Cc: Justin Pimpare, EPA
Joseph Canzano, EPA
David Turin, EPA
David Burns, DEP
Robert Greene, DEP
Kevin J. Dumas, Mayor
Barry K. LaCasse, City of Attleboro
Aaron Dumont, City of Attleboro
John Reed, City of Attleboro
Thomas Hayes, City of Attleboro

A EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning the effective date and lasting through expiration, the permittee is authorized to discharge from outfall serial number 001 Pretreatment room final tank. (November 6-2011–December 31-2015) Equalized Flow.

Such discharges shall be limited and monitored by permittee as specified below:

| Effluent Characteristic | | Discharge Limitations specify units | | | Monitoring Requirement Frequency | Type |
|-------------------------|-------|--|-------------------|------------------|-------------------------------------|------------------------------|
| | | Monthly Average | Weekly Average | Maximum Daily | | |
| Flow | | | | 30,000 | Continuous | Metered 1. |
| PH | LL | | | 5.5-9.5 | Continuous | Metered |
| Temperature | LL | | | 104 | Continuous | Metered |
| Petroleum Oil & Grease | LL | | | 15 | 4/Year Quarterly | Representative Grab 3. |
| TKN | LL | | | 691 | 4/Year Quarterly | Representative Composite 3. |
| Aluminum | LL | | | 1.3 | 4/ Year Quarterly | Representative Composite. 3. |
| Cadmium | LL | | | 0.031 | 4/ Year Quarterly | Representative Composite. 3. |
| Chromium total | LL | | | 1.71 | 4/ Year Quarterly | Representative Composite. 3. |
| Copper | LL | | | 0.77 | 4/ Year Quarterly | Representative Composite. 3. |
| Iron | | Report | Results | | 4/ Year Quarterly | Representative Composite. 3. |
| Lead | LL | | | 0.052 | 4/ Year Quarterly | Representative Composite. 3. |
| Nickel | LL | | | 1.8 | 4/ Year Quarterly | Representative Composite. 3. |
| Silver | LL | | | 0.15 | 4/ Year Quarterly | Representative Composite. 3. |
| Zinc | LL | | | 1.48 | 4/ Year Quarterly | Representative Composite. 3. |
| Cyanide | CS-AL | | | 0.05 | 4/ Year Quarterly | Representative Grab 3. |
| TTO 624 & 625 | | | | 2.13 | 1/ Year | Representative Grab 2. |
| Ammonia | | Report | Results | | 4/ Year Quarterly | Representative Composite. |
| Suspended Solids (TSS) | | Report | Results | | 4/ Year Quarterly | Representative Composite. |

2. Samples to be taken by POTW personnel or in the presence of POTW personnel.

3. Unannounced sampling also conducted by the city twice per year.

CS: CATEGORICAL STANDARD

LL: LOCAL LIMIT

AL: ALTERNATIVE LIMIT COMBINED WASTE STREAM FORMULA



City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER
Government Center, 77 Park Street
Attleboro, Massachusetts 02703
Phone 774-203-1820 ♦ Fax 508-761-9837

COMPLIANCE ORDER

No. 12 - 1

November 7, 2012

I. STATUTORY AUTHORITY

The following Findings are made and this ORDER is herein issued pursuant to the City of Attleboro Ordinance Section 16-21.1(4) Administrative Enforcement Remedies – Compliance Orders which grants the Superintendent of Wastewater the authority to issue orders directing that the user come into compliance with any provisions of Section 16-15 of said ordinance.

II. FINDINGS

This Order herein is based on the findings of violation of Section 16-15.8 Specific Prohibitions Sections a, c, j, n, t, u1, u2, u3, and u4, of the City of Attleboro Ordinances and the conditions of the modified Industrial User Permit No. 026. The order provides a compliance date of April 30, 2013, which the Superintendent has determined to be reasonable.

III. ORDER

This Compliance Order is issued by the City of Attleboro to Metalor Technologies USA located at 52 Gardner Street Attleboro, Massachusetts 02703 Industrial User Permit No. 026.

Accordingly, it is hereby ordered that:

1. By December 1, 2012, Metalor Technologies USA shall submit to the City of Attleboro an engineering report, which includes the following:
 - a. A detailed summary of measures that will be implemented by Metalor Technologies USA to reduce the Concentration of TKN, being discharged from your facility.
 - b. A detailed evaluation and explanation of the causes of the excessive TKN being discharged.
 - c. Specific recommendations for interim and long-term corrective measures proposed to eliminate these violations of your modified industrial user permit, including a schedule for their implementation.

IV. NOTIFICATION PROCEDURES

1. Where this Order requires a specific action to be performed within a certain time frame, the Permittee shall submit a written notice of compliance or noncompliance by the last day of each month during the specified compliance time frame of April 30, 2013. The timely submission of a required report shall satisfy the requirement that a notice of compliance was received.
2. If noncompliance is reported, notification should include the following information:
 - a. A description of the noncompliance;

- b. A description of any actions taken or proposed by the Permittee to comply with the requirements;
- c. A description of any factors that explain or mitigate the noncompliance; and
- d. An approximate date by which the Permittee will perform the required action.


3. After a notification of noncompliance has been filed, compliance with the past requirement shall be reported by submitting any required documents or providing the Superintendent with a written report indicating that the required action has been achieved. Submissions required by this Order shall be in writing and should be mailed to the following address.

City of Attleboro
Wastewater Treatment Plant
77 Park Street
Attleboro, MA 02703

V. GENERAL PROVISIONS

- 1. This Order does not constitute a waiver or a modification of the terms and conditions of the Permit. The Permit remains in full force and effect. The City of Attleboro reserves the right to seek any and all remedies available under the City of Attleboro Ordinances Section 16-15.8. as amended, for any violation cited in this Order.
- 2. This Order shall become effective upon receipt by the Permittee.

11/7/2012
Date


Paul A. Kennedy
City of Attleboro
Superintendent of Wastewater

Cc: Justin Pimpare, EPA
Joseph Canzano, EPA
David Turin, EPA
Robert Greene, DEP
David Burns, DEP
Kevin J. Dumas, Mayor City of Attleboro
Barry LaCasse, City of Attleboro
Aaron Dumont, City of Attleboro
John Reed, City of Attleboro
Thomas Hayes, City of Attleboro

| PARAMETER | CONCENTRATION | UNITS |
|-----------|---------------|-------|
| TKN | 691 | mg/l |